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9 KD Creatives, Inc.

10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**

12 JENNIFER CARRUTH,

13 Plaintiff

14 vs.

15 KD CREATIVES, INC.,

16 Defendant.
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Case No.: 2:24-CV-02484-DAD-SCR

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT**

Complaint served: September 13, 2024
Current response date: November 1, 2024
New response date: November 15, 2024

1 Plaintiff JENNIFER CARRUTH (“Plaintiff”) and Defendant KD CREATIVES,
2 INC. (“Defendant”), by and through their undersigned attorneys, stipulate and agree as
3 follows:

4 WHEREAS, Plaintiff served Defendant on September 13, 2024, with the
5 Complaint (“Complaint”) in the above-referenced action;

6 WHEREAS, Defendant’s original deadline to respond to this initial service was
7 October 4, 2024;

8 WHEREAS, pursuant to Local Rule 144, the parties stipulated to a twenty-eight
9 (28) day extension of time in order to investigate and discuss a potential settlement of the
10 dispute, making Defendant’s response due on November 1, 2021;

11 WHEREAS, the parties are actively investigating the allegations in the Complaint
12 for purposes of settlement discussions;

13 WHEREAS, accordingly, respective counsel for the parties have agreed to extend
14 Defendant’s time to respond to the Complaint for 14 days, up to and including November
15 15, 2024, in order to continue with investigation and settlement discussions, with the goal
16 of reaching a resolution without incurring potentially unnecessary litigation expense, nor
17 wasting judicial resources;

18 Accordingly, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

19 Without prejudice to any of the parties’ rights or defenses, Defendant’s time to
20 respond to the Complaint in this action shall be extended for 14 days, until November 15,
21 2024.

22 SO STIPULATED.

23 Dated: October 22, 2024

NOLAN HEIMANN, LLP

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26 By: /s/ Jordan Susman
27 Jordan Susman
28 Attorneys for Defendant
KD Creatives, Inc.

1 Dated: October 22, 2024

HEDIN, LLP

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4 By: /s/ Frank S. Hedin (as authorized on Oct. 20, 2024)

5 Frank S. Hedin

6 Attorneys for Plaintiff

7 Jennifer Carruth